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Thomas
Turner/R5/USEPA/US
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To
Subject Old American Zinc Plant (OAZ) Superfund Site (IL) -
Guidance Information and Notification Concerning
Demolition/Removal Actions of XTRA Intermodal

By E-Mail Only

XTRA Intermodal, Inc.
c/o: Michael W. Steinberg, Esq.
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004

Re: Demolition Work Planned at XTRA Intermodal property involving OAZ Superfund Site, Fairmont City, IL - Notice of Illinois Environmental Protection Agency (IL EPA) Guidance/Concerns

Mr. Steinberg:

Please be aware that the attached information is directly related to actions that you have previously mentioned your client is planning at the OAZ Superfund Site, involving the removal and/or demolition of some of its facilities and/or other physical plant properties. There are a number of preliminary notices and measures that your client apparently needs to perform involving contact with the environmental (and other) agencies within the State of Illinois. It is not clear to USEPA staff whether these notifications have been made, and preliminary measures performed.

Sincerely,

Tom Turner, USEPA, ORC, Region 5
e-mail or 312/886-6613

I) From IL EPA:

Doyle Wilson (of IL EPA) said below that IL EPA has not received the notice from XTRA to perform the demolition, nor has IL EPA received any information on the asbestos content in or near the buildings (essentially, IL EPA hasn't received an "asbestos survey.") Since XTRA has not properly notified or provided information to IL EPA, XTRA shouldn't be starting removal or demolition work.

II) (From USEPA consult on applicable UST issues):

As requested, for a UST removal in Illinois **the owner needs to be working with the Illinois State Fire Marshall's Office**. They oversee the day-to-day compliance and tank removals. **If contamination over the action level is identified during removal, then the facility will be working with the IL EPA for remediation.**

The facility needs to contact the Illinois State Fire Marshall at least 30 days prior to a tank removal for the appropriate permit. Also, a licensed tank remover has to perform the work. Please contact the state at the following:

Bill Alderson, Field Operations Manager
Division of Petroleum & Chemical Safety
Illinois Office of State Fire Marshal
1035 Stevenson Drive
Springfield, Illinois 62703-4259
(217) 785-5878 or 785-1020 (or 785-7808 direct)
E-Mail: Bill.Alderson@illinois.gov

III) (From USEPA contractor on RI/FS and IL EPA) :

For asbestos...we need to know the type of ACM, which should be determined prior to demo, to determine the appropriate steps. In addition, XTRA has to give notice to IL EPA at least 10 days prior to demo if the amount of ACM is of certain quantity (also determined by the official inspection). **Also** : XTRA should not assume that by sending USEPA a letter that they are not required to follow IL EPA requirements.

ii) And, directly from IL EPA:

Prior to any renovation or demolition activities, you must first inspect your facility or the affected portion of your facility for the presence of regulated ACM. Certain types of asbestos are regulated differently under NESHAP regulations. Specifically, regulated ACM is: 1) friable ACM; 2) Category I nonfriable ACM that is in poor condition has become friable; 3) Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting or abrading, or 4) Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder in the course of demolition or renovation operations. Category I nonfriable ACM consists of any asbestos-containing packing, gasket, resilient floor covering, or asphalt roofing product that contains more than 1 percent asbestos as determined using PLM.

Category II nonfriable ACM consists of any material except for Category I nonfriable ACM that contains more than one percent asbestos as determined using PLM and that when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Friable regulated ACM is present in many public and commercial buildings, apartment buildings and factories built before the mid-1970s and in some buildings built after the mid-1970s. If you are not sure if regulated ACM is present at your facility, hire a licensed asbestos inspector who may obtain samples for laboratory analysis. Call the Illinois Department of Public Health at (217) 782-3517 for a list of licensed asbestos inspectors.

If an inspector has determined that regulated ACM removal is necessary, a notice of the removal must be delivered or postmarked to the Illinois Environmental Protection Agency (Illinois EPA) at least 10 working days prior to the commencement of demolition or renovation if the amount of regulated ACM to be removed exceeds 160 square feet, 260 linear feet, or 1 cubic meter. This notification of demolition and renovation form can be obtained by calling the Illinois EPA Office of Small Business.

Although you will hire a licensed contractor to conduct regulated ACM removal work, you should be aware of the requirements below for contractors during removal activities.

A NESHAP-trained person must be present.

The area from which the asbestos will be removed should be sealed off and any forced-air heating systems should be shut off.

Workers should wear a respirator fitted with cartridges that filter out asbestos fibers. The asbestos should not be broken into small pieces because this can increase the amount of airborne asbestos fibers.

The asbestos should be kept wet during the entire removal process.

The asbestos waste should be containerized and labeled for disposal at an approved landfill. The area from which the asbestos was removed should be cleaned

thoroughly with a wet mop, rags or sponges.

Asbestos removal workers should decontaminate themselves.